



Glavin PLLC
156 W. 56th Street, Suite 2004
New York, NY 10019

glavinpllc.com
646.693.5505

January 9, 2025

VIA ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Sergey Shestakov, 23 Cr. 16 (JHR)

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced action, and write to respectfully inform the Court that yesterday afternoon I was selected to serve as a federal grand juror every Monday and Wednesday for the next eight months (to August 2025) beginning this Monday January 13, 2025, despite informing presiding Magistrate Judge Barbara Moses that I have a three-week long federal criminal trial starting on February 10, 2025 before this Court. Magistrate Judge Moses declined to excuse me and advised me to take this issue up with your Honor.

I cannot, consistent with my client Sergey Shestakov's Sixth Amendment right to effective assistance of counsel and my own professional and ethical responsibilities to Mr. Shestakov, adequately prepare for and handle this complex three-week jury trial commencing in approximately four weeks and simultaneously serve as a grand juror. As the Court is aware, this is a complex criminal case involving: voluminous discovery (including thousands of records in Russian that we are still working through, and as well as phone and digital records that we are still analyzing and creating exhibits for); traveling to Dubai, U.A.E. for a critical Rule 15 deposition of Evgeny Fokin prior to trial that requires extensive preparation; numerous witnesses (prosecution and defense) that we are in the process of preparing for; and complex motion practice that will be ongoing over the next few weeks and throughout the trial. This is simply an untenable situation for me to adequately represent Mr. Shestakov and provide him with the level of attention, preparation and advocacy to which he is entitled and rightfully expects.

Accordingly, I respectfully request that the Court immediately intervene to rectify this situation such that I am excused from grand jury service until the trial is complete.

Respectfully submitted,

/s/ Rita M. Glavin
Rita M. Glavin